U.S. Department of Transportation
United States Coast Guard

Commanding Officer
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Marine Safety Office Juneau

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16700
April 6, 2001

To: Cruise Ship Master

Subj: 2001 SOUTHEAST ALASKA CRUISE SHIP SEASON

I am very pleased to welcome you back to Southeast Alaska for another cruise ship season! As in previous years I am using this letter to provide a recap of last year's operational season including lessons learned, areas for improvement and to provide a projection of the concerns for the upcoming season. Last year I had the pleasure of making several ship-rides as well as making personal visits to many of the vessels arriving in Juneau. In all cases I was impressed with the professionalism and expertise of the masters and crews. These visits were an excellent opportunity for me to listen to your concerns, exchange information and gain valuable insight on areas where we can strengthen our working relationships. I am confident that by working together and following the principle of Shared Commitment, our joint efforts will ensure safe and environmentally sound operations in Alaskan waters.

Safety of life remains the number one priority for maritime operations in Alaskan waters. You carry the most precious of cargoes and I know that the safety of your passengers and crew is foremost among your operational considerations. Overall, the 2000 season gets high marks for safety. I appreciate your efforts last season in employing risk reduction measures during our periods of heavy weather. There were several instances where masters voluntarily altered routes, delayed transit times and used tug assistance as means to make the voyage safer. However, despite our best efforts, there were casualties last year. The most serious was a crewmember fatality from a watertight door accident and an extensive fire in a crew's quarters. A joint review of each circumstance resulted in immediate corrective action aboard the vessels that will help prevent reoccurrence of similar events. We must maintain our safety vigilance for the 2001 season.

One of the major focuses during the 2000 season was the impact of cruise ship wastewater discharges on Alaskan waters. Under the Alaska Cruise Ship Initiative (ACSI) several voluntary initiatives were implemented including, closure of the "donut holes" for discharge of untreated sewage and wastewater sampling. Test results indicated high levels of fecal coliform and suspended solids and as a result, operational guidelines were established for wastewater discharges. What has changed for this season is that new federal legislation entitled, Title XIV of Public Law 106-554, has been enacted that is applicable to cruise vessels operating in Alaskan waters. You shall observe Section 1403 of Title XIV and not discharge untreated sewage into Alaska waters. Additionally, you shall observe Section 1404 and only discharge treated sewage as permitted therein and only if it meets the standards set in Section 1407. Specifically, your vessel's treated effluent discharge shall not have a fecal coliform bacteria count of greater than 200 per 100 milliliters, nor suspended solids greater than 150 milligrams per liter. Further, you shall immediately self-report any discharge you may have in violation of Sections 1403 and 1404 as required by Section 1408, to the nearest U. S. Coast Guard Captain of the Port. Observance of

these noted sections of Title XIV does not relieve you from observance of the statute as a whole. Failure to comply with these new statutory standards may result in civil and criminal penalties.

In addition to the federal legislation, the Coast Guard has developed "Environmental Standards of Care." I encourage each of you to review the standards listed in Enclosure (1) and highly recommend you incorporate those items into your wastewater management procedures. These standards supplement the federal legislation aimed at minimizing the harmful effects on Alaskan waters. Details of the legislation and proposed implementing regulations can be viewed electronically at Marine Safety Office Juneau's website. This link is found at **www.uscg.mil/d17/msojuneau**. Once at the site, click on the **Cruise Ship Information and Links**.

Finally, I encourage you to review several important findings my inspection staff noted during last season; Enclosure (2) provides information from the over 30 examinations conducted. Although the list is not all-inclusive, it captures relevant information for noteworthy areas. I also encourage you to review the Marine Safety Office Juneau Cruise Ship website, which contains several documents and reference material that will enhance safe operations and provide a better understanding to the Control Verification Examination process.

Again, I appreciate your professionalism and commitment to work together to do the right things to improve safety and better protect the pristine waters of Alaska. My staff and I welcome your feedback on these important issues. I look forward to meeting you during the 2001 season.

Sincerely,

R. C. LORIGAN
Captain, U. S. Coast Guard
Officer in Charge, Marine Inspection
Southeast Alaska

Encl: (1) Environmental Standards of Care for Cruise Ships operating in Alaska
(2) 2000 Southeast Alaska Cruise Ship Findings

Environmental Standards of Care

For Cruise Ships Operating in Alaska

- **Annual Pre-arrival Sample Results: Operators intending to discharge treated sewage in Alaska waters should sample and test those effluents 30 days prior to arrival and self-certify to the local Captain of the Port that the effluents meet the minimum standards of 200 fecal coliform and 150 total suspended solids.**

- **Managed and Serviced Sewage Treatment Plants: Operators should ensure sewage treatment plants are properly maintained and serviced in accordance with operations manuals. In addition, operators should conduct periodic sampling and testing of treated sewage to monitor contents of discharged effluents and potential impacts to the marine environment. An effective sampling program includes regular testing for conventional pollutants as well as random testing for priority pollutants.**

- **Graywater Management Program: Operators should conduct periodic sampling and testing of graywater to determine potential impacts to the marine environment. An effective sampling program includes regular testing for conventional pollutants as well as random testing for priority pollutants.**

- **Sewage and Graywater Discharge Record Book: Operators should maintain a sewage and graywater discharge record book recording times, volumes, and vessel location where the waste is discharged for each graywater and treated sewage discharge port.**

- **Research Into New Treatment Technologies: Operators should continue research into promising new technologies that improve treatment of wastes and share knowledge gained with other operators.**

- **Crew Environmental Awareness Training: Operators should train all members of the crew on environmental compliance laws and practices and retrain as necessary to ensure proper management procedures are followed.**

- **Shared Commitment: Operators should continue to partner with Federal, State and local stakeholders as well as concerned citizens and environmental groups with the goal of continuous improvement in the quality of waste discharges.**

2000 SEASON FINDINGS

OUTSTANDING:

DRILLS

- Vessels well prepared for both Fire and Abandon Ship drills. Crews trained and aggressive in response actions.
- Collectively, cruise ships continued to demonstrate the best overall drills when compared to other commercial vessels that were examined.
- During this season, CG Inspectors did not inject items during fire drill, unless a safety or major procedural issue surfaced. By allowing the ship to conduct it's own drill, we were able to see, specifically, how the ships train. Also, we requested the vessel staff provide bridge debrief of drill, as we determined this provided the best overall assessment of the SMS process at work.

DOCUMENT CHECK

- Ships completed either Self-Certifying Document form or CG-840 Guide prior to arrival of CG Inspection team. Greatly reduced administrative checks during examination.

IN-BRIEF CHECKLIST

- Use of In-Brief Checklist well received by industry. This checklist outlines expectations and areas to be examined.

MATERIEL CONDITION

- The relatively young age of the cruise ship fleet, coupled with extensive use of modern technology, is reflected in the high state of material readiness and safety systems that far exceed minimum requirements.

PROACTIVE CASUALTY REPORTING

- On several occasions, vessels quickly reported problems, or potential problems, to the local Marine Safety Office. This proactive approach was appreciated by the COTP, as it allows our office time to manage the situation.

PROACTIVE WEATHER DELAYS

- Ships delayed sailing, or required tug assist, when severe wind or weather forecasted. Through such proactive measures, the COTP SEAK did not once impose our Heavy Weather Plan and associated requirements.

INCONSISTENCIES:

SECURITY

- During several examinations, CG Inspection team was not asked for ID verification.

IN-SERVICE RAFT INFLATION

- During Annual CVE's, it has been agreed that an in-service raft (due for servicing) would be maintained o/b for use during exam. This is a great way to (1) spot check a raft that has been packed by an approved facility and (2) allow raft crew to inflate and observe actual

25 person raft (vice 12 person training raft). During this season, only a couple ships were prepared (i.e. had available) to inflate an in-service raft during the annual examination.

SAFETY HELMETS (HARD HATS)

- Several vessels conducted lifeboat lowering/launching without all crewmembers assigned to boats wearing safety helmets. On two occasions, the coxswain was nearly hit with the releasing block, which reinforces the need to wear safety equipment.

SCHEDULING ERRORS

- Although 90% of all scheduled inspection activities went without an issue, on a few occasions vessels were either not expecting the exam or were not prepared. Some companies schedule inspections via the corporate office, while others schedule via vessel.

LANGUAGE BARRIERS

- Inspectors noted, during a few exams, that the designated working language of the vessel (English) was not spoken well by crewmembers in critical safety positions. Specifically, some passenger traffic directors and lifeboat commanders did not speak/understand the English language at a level required to hold such a position.

AREAS FOR IMPROVEMENT:

FIRE HAZARDS

- After the Fire on board the Nieuw Amsterdam, CG began randomly checking crew cabins for potential fire hazards (cooking appliances, clothes irons, electrical connections, etc.). Even after aggressive measures were taken by the Cruise Industry, we still found several cabins with potential fire hazards.

WATERTIGHT DOOR

- During the 2000 season a crewmember was killed when caught in a watertight door. CG inspection teams took a more aggressive look at door closure rates (SOLAS requires 20-40 seconds) and found several ships with doors that closed too quickly. In some cases, doors were closing in less than 10 seconds, clearly posing a human safety risk.

SEWAGE TREATMENT PLANTS

- Within the past year there has been an increased emphasis, both at the State and Federal level, on the cruise ship industry's impacts to the Alaskan environment. This focus will continue throughout the 2001 season as part of the Coast Guard's Control Verification Examination (CVE) program, coupled with newly enacted federal legislation. The Coast Guard remains the primary federal agency responsible for examining cruise vessels for compliance with international and U. S. regulations pertaining to the proper administration of waste streams. While the primary goal of these CVE examinations remains safety of life, you can expect additional efforts made by my inspectors in reviewing waste stream management procedures and evaluating the operational condition of pollution prevention equipment. This could entail shiprides to monitor the proper operation of the equipment and verification through random sampling of greywater and blackwater. It is imperative that we work together to do the right things to protect the pristine Alaskan environment.

ADDITIONAL INFORMATION:

AWAY TEAM FOR SIGNIFICANT CASUALTIES – In Southeast Alaska, we have established a special interagency major marine incident response team. This "Away Team" is designed to assess the incident on-scene and assist the vessel Master in coordinating landside response organizations. Led by a qualified member from my office, this team will consist of, depending on the nature of the casualty, state and local government experts in marine firefighting, law enforcement, emergency medical services, and pollution abatement. The membership of this team will be limited to a maximum size of 5. The Away Team will be a vital link between the vessel and local response agencies.

SOUTHEAST ALASKA VOLUNTARY WATERWAYS GUIDE – The Southeast Alaska Voluntary Waterways Guide, developed by the Marine Safety Task Force, is available at our unit website referenced in the cover letter.

TONGASS NARROWS VOLUNTARY WATERWAY GUIDE – Much like the Southeast Alaska Voluntary Waterway Guide, this version has been tailored to address specific risks associated with the heavily congested Tongass Narrows. A copy of this guide is available at our unit website, under the MSD Ketchikan link.

IMPORTANT CONTACT INFORMATION – The following information is provided to assist if you should need to contact our office. Please note that we have representatives available in Juneau, Ketchikan and Sitka. These offices are open Monday through Friday (0730 – 1600):

Marine Safety Office Juneau 2760 Sherwood Lane, Suite 2A Juneau, AK 99801	**(907) 463-2450** Phone **(907) 463-2472** Fax
Marine Safety Detachment Ketchikan 2030 Sealevel Drive #203 Ketchikan, AK 99901	**(907) 225-4469** Phone **(907) 225-4499** Fax
Marine Safety Detachment Sitka 329 Harbor Drive Sitka, AK 99835	**(907) 966-5454** Phone **(907) 966-5457** Fax

*After normal office hours, and for **ALL Emergencies**, contact U.S. Coast Guard Juneau Command Center at **(907) 463-2000** or via Channel 16 VHF-FM.*